

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: : CHAPTER 7
:
AMERICAN UNDERWRITING : CASE NO. 18-58406-SMS
SERVICES, LLC, :
:
Debtor. :

**FIRST AND FINAL APPLICATION FOR ALLOWANCE OF
COMPENSATION OF HAYS FINANCIAL CONSULTING, LLC, AS ACCOUNTANTS
TO THE CHAPTER 7 TRUSTEE**

COMES NOW Hays Financial Consulting, LLC (“**HFC**” or “**Applicant**”), accountants to S. Gregory Hays, Chapter 7 Trustee (“**Trustee**”) for the above-styled case, and, pursuant to 11 U.S.C. § 330 and Bankruptcy Rule 2016, files this first and final application (“**Application**”) seeking final allowance of compensation in the amount of \$80,475.00 and reimbursement of expenses in the amount of \$1,868.29 for the period from July 27, 2018 through and including July 22, 2021 (the “**Application Period**”). In support hereof, Applicant shows as follows:

1.

On May 18, 2018 (the “**Petition Date**”), American Underwriting Services, LLC (“**Debtor**”) filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended, modified, or supplemented, the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division, initiating Chapter 11 Case No. 18-58406-sms.

2.

On June 27, 2018, the United States Trustee filed a Notice of Appointment of Chapter 11 Trustee and Setting of Bond [Doc. No. 70] pursuant to which S. Gregory Hays was appointed as the Chapter 11 Trustee for the bankruptcy estate of the Debtor. After the United States Trustee

filed an Application for Approval of Selection of Appointment of Chapter 11 Trustee [Doc. No. 73] on June 28, 2018, the Court entered an Order Approving Appointment of Chapter 11 Trustee [Doc. No. 77] on June 29, 2018, confirming the appointment of S. Gregory Hays as the Chapter 11 trustee in the Case.

3.

On July 11, 2018, Trustee filed *Application for Approval of Employment of Hays Financial Consulting, LLC as Accountants for the Trustee* [Doc. No. 83] seeking an order from the Court authorizing him to retain Applicant as his accountants during the Chapter 11 period, and, on July 12, 2018, the Court entered its Order [Doc. No. 86] approving the retention of Applicant and the employment of Applicant as accountant for Trustee.

4.

On August 1, 2018, the Court converted the Case to a proceeding under Chapter 7 effective July 27, 2019 [Doc. No. 106] and directed the United States Trustee to appoint a trustee in the Chapter 7 Case.

5.

On August 24, 2018, Trustee filed *Application for Approval of Employment of Hays Financial Consulting, LLC as Accountants for the Trustee* [Doc. No. 122] seeking an order from the Court authorizing him to retain Applicant as his accountants, and, on August 31, 2018, the Court entered its Order [Doc. No. 125] approving the retention of Applicant and the employment of Applicant as accountant for Trustee.

6.

Pursuant to this Application, Applicant seeks final approval, allowance, and payment pursuant to §§ 330 and 331 of the Bankruptcy Code of compensation for services rendered as accountants for the Trustee incurred in connection therewith during the Application Period.

7.

For the period covered by this application, HFC devoted a total of not less than 285.5 hours in rendering services as accountants to the Trustee. Applicant has not previously been allowed or paid any compensation for the period covered by this application. Summaries of hours spent by subject area and by professional are attached as Exhibit "A".

8.

The Services of the Applicant during the Application Period are summarized by category below.

(a) **Accounting.** This category includes efforts of the Applicant in obtaining the Debtor's books and records located at from the Debtor's office and setting up accounts, accessing open invoices, compiling data and preparation of the Chapter 11 monthly operating reports, review of debtor's records for select transactions, analysis of insurance premium collections and payments, and reconciled administrative claims to bank records,

(b) **Business Analysis.** This category involves time by Applicant analyzing Debtor's operations and wind down of same including the turnover and termination of insurance polies.

(c) **Claims Administration & Objections.** This category involves time reviewing claims and preparing a distribution analysis for the case wind down.

(d) **Data Analysis.** This category involves time backing up the Debtor's servers and winding down the electronic storage of same, arranging for the hosting of the Debtor's data, preparation of data as requested by carriers and other parties, and addressing hosted emails.

(e) **Employee Benefits / Pensions.** This category involves preparing separation notices to current employees, preparation of necessary payroll reporting, preparing annual W-2s and required reporting, and communications with former employees W-2 issues.

(f) **Fee / Employment Applications & Objection.** This category includes the Applicants efforts to prepare this first and final fee application and its Chapter 11 fee application.

(g) **Litigation Consulting.** This category involves time investigating payments and transactions involving insiders and preparing reports and documents of same, and compiling documents and data pursuant to the subpoena from the Cobb County DA,

(h) **Tax Issues.** This category includes activity by the Applicant including determining information necessary for preparation of tax returns, contacting taxing authority, arranging for the preparation of 1099s, W-2s, unemployed returns, contacting and reviewing prior accountants to determine income tax preparation requirements and verifying claims asserted by tax authorities including various state taxing authorities, .

9.

Applicant shows that all services were necessary to assist the Trustee in the proper and effective administration of the Debtor's estate and the exercise of the powers of the Trustee.

Applicant shows that the fair and reasonable value of such services, and the costs of comparable services in a case not proceeding under the Bankruptcy Code, is not less than \$80,475.00, based primarily on the normal hourly rates of providing such services and calculated using the “lodestar” calculation of reasonable hourly rates multiplied by the number of hours actually expended, as summarized on Exhibit “A”. The time expended and services performed by HFC are duly itemized and set forth in Exhibit "B" attached hereto and by reference incorporated herein and made part of this Application.

10.

Applicant shows that all services for which compensation during this Application Period is requested have been actually provided to the Debtors and/or the Trustee, and to no other parties, and have been necessary for the proper and effective administration of this case and for the benefit of the Debtor’s estate and its creditors.

11.

Applicant’s employees have substantial experience and expertise in providing financial and accounting services in bankruptcy cases and to fiduciaries in such cases. Applicant’s employee hourly rates are fair and reasonable and the same as the cost for such services other than in a bankruptcy case.

12.

The compensation requested is allowable pursuant to the twelve factor test (the “Johnson Factors”) set forth in Johnson v. Georgia Highway Express, Inc., 488 F.2d 714, 717-19 (5th Cir. 1974), as modified and made applicable to bankruptcy cases by the Eleventh Circuit Court of Appeals in Grant v. George Schumann Tire & Battery Co., 908 F.2d 874 (11th Cir. 1990). The Johnson Factors and their applicability in these cases are as follows:

(a) Time and Labor Required: HFC expended 285.5 hours in performing services as accountants to the Trustee during the Application Period. The billing rates of the various professionals and other personnel who have performed services for the Committee are detailed in HFC's billing statements, which are attached hereto as Exhibit "A".

(b) Novelty and Difficulty of Questions Presented: The work performed by HFC has involved issues of varying complexity, as set forth in substantial detail in the billing statements attached to this Application.

(c) Skill Requisite to Perform Professional Services: The Trustee selected HFC as its accountants because HFC's professionals possess substantial expertise and experience in bankruptcy and related fields and are well-qualified to perform professional services.

(d) Preclusion of Other Employment Due to Acceptance of the Cases: Professionals of HFC have devoted time and resources to these cases, to the possible preclusion of involvement in other matters.

(e) Customary Fees for the Type of Services Rendered: HFC believes that the fees requested and the hourly rates set forth herein are consistent fees typically charged for the type of services rendered in cases of this magnitude and complexity. The hourly rates charged by HFC in this Application are comparable to the rates that HFC would charge to a non-bankruptcy client for work of a similar nature and complexity.

(f) Whether the Fee is Fixed or Contingent: Pursuant to section 330(a) of the Bankruptcy Code, HFC's fee is subject to Court approval, and is primarily based upon

hourly rates and does not involve any fixed or flat fees. Compensation is “contingent” only in the sense that there are risks of non-allowance or non-payment.

(g) Time Limitations Imposed by the Client or Other Circumstances: Certain tax filing deadlines have been applicable herein.

(h) The Amount Involved and Results Obtained: HFC shows that the Trustee, with the assistance of all professionals involved, has achieved a successful result in this case.

(i) The Experience, Reputation, and Ability of the Professional: HFC has extensive experience in bankruptcy matters. Its reputation and ability are well known to the Court.

(j) Undesirability of the Case: This factor is inapplicable to the present Chapter 7 cases.

(k) Nature and Length of Professional Relationship with the Client: HFC was employed by the Trustee as his accountants in this bankruptcy case. Thus, the professional relationship is an ongoing one.

(l) Awards in Similar Cases: HFC is regularly awarded compensation in Chapter 7 and Chapter 11 cases on the same basis as requested herein.

13.

In connection with the provision of services as set forth herein above, Applicant has incurred expenses in the amount of \$1,868.29. Expenses are summarized on **Exhibit “A”** and itemized on **Exhibit “C”** attached hereto and incorporated herein. Applicant seeks allowance of said expenses as reasonable and necessarily incurred.

14.

No agreement or understanding exists between HFC and any other person for the sharing of compensation to be received for services rendered in connection with this case. All services for which compensation is requested were performed for the Trustee and the estate and not on behalf of any committee, creditor or any other person or persons.

15.

Based on the foregoing, Applicant seeks final allowance of \$80,475.00 as compensation and reimbursement of expenses in the amount of \$1,868.29 for the period covered by this Application. Applicant shows that compensation in such amount is reasonable compensation based on the nature, the extent, and the value of services rendered, the time spent to provide such services, and the cost of comparable services other than in a bankruptcy case.

16.

Attached hereto as Exhibit "D" is a Declaration of S. Gregory Hays, Managing Principal of Applicant, confirming the facts set out in the Application and exhibits hereto.

WHEREFORE, Applicant respectfully prays:

- a. That Applicant be allowed final compensation in the amount of \$80,475.00 as and for the reasonable value of services rendered in connection with its retention as accountants for the Trustee for the Application Period;
- b. That Applicant be allowed the sum of \$1,868.29 for the reimbursement of out-of-pocket expenses incurred in this case during the Application Period;
- c. that the Court authorize payment of amounts allowed as deemed appropriate and equitable by the Court from the fund available in the bankruptcy estate; and
- d. that the Court grant such other and further relief as may be just and proper.

Respectfully submitted, this 22nd day of July, 2021.

/s/ S. Gregory Hays
S. Gregory Hays

Hays Financial Consulting, LLC
2964 Peachtree Rd, NW Ste. 555
Atlanta, Georgia 30305
(404) 926-0060

Exhibit A

Hays Financial Consulting, LLC

2964 Peachtree Road
Suite 555
Atlanta, GA 30305-2153

American Underwriting Services LLC

Case # 18-58406-SMS

For the Period from 7/27/2018 to 7/21/2021

July 21, 2021

Professional Services

	<u>Hours</u>	<u>Amount</u>
Accounting	103.50	27,950.00
Business Analysis	30.90	8,520.00
Claims Administration & Objections	6.70	2,010.00
Data Analysis	27.30	8,190.00
Employee Benefits / Pensions	8.00	2,275.00
Fee / Employment Applications & Objection	5.00	1,500.00
Litigation Consulting	75.10	21,405.00
Tax Issues	29.00	8,625.00
For professional services rendered	285.50	\$80,475.00

Additional Charges :

Document Storage	1,020.00
Document shredding and computer destruction	500.00
Expense Reports	8.70
Federal Express	142.17
GSCCCA Printing Fees	4.00
Miscellaneous	50.00
Pacer Charges	6.50
Postage	135.66
Tax Return Preparation	1.26
Total costs	\$1,868.29

Total amount of this bill

\$82,343.29

Hays Financial Consulting, LLC

2964 Peachtree Road
Suite 555
Atlanta, GA 30305-2153

American Underwriting Services LLC
Case # 18-58406-SMS

For the Period from 7/27/2018 to 7/21/2021

July 21, 2021

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
Dwaine A. Butler	25.20	4,410.00
	175.00/hr	
James R. Jennings, CPA	22.00	6,600.00
	300.00/hr	
Scott S. Askue	224.80	67,440.00
	300.00/hr	
Theresa Brummer	13.50	2,025.00
	150.00/hr	
For professional services rendered	285.50	\$80,475.00

Additional Charges :

Document Storage	1,020.00
Document shredding and computer destruction	500.00
Expense Reports	8.70
Federal Express	142.17
GSCCCA Printing Fees	4.00
Miscellaneous	50.00
Pacer Charges	6.50
Postage	135.66
Tax Return Preparation	1.26
Total costs	\$1,868.29

Total amount of this bill	\$82,343.29
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Exhibit B

Hays Financial Consulting, LLC

2964 Peachtree Road
Suite 555
Atlanta, GA 30305-2153

American Underwriting Services LLC
Case # 18-58406-SMS

For the Period from 7/27/2018 to 7/21/2021

July 21, 2021

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
<u>Accounting</u>			
7/28/2018	TB Downloaded and entered bank information from June and July 2018 as necessary. Reconciled bank accounts for June; reconciled July to date. Reviewed and responded to email from the Trustee.	1.90 150.00/hr	285.00
7/30/2018	TB Downloaded pending bank transactions. Set up test check to verify printer alignment. Set up vendors, entered payment information and prepared check file.	1.00 150.00/hr	150.00
	SSA Reviewed outstanding expenses. Arranged for preparation of checks of same.	0.70 300.00/hr	210.00
	SSA Reviewed premiums received report and calculations of amounts owed. Drafted email to Stephen Uhler regarding same.	0.60 300.00/hr	180.00
8/1/2018	SSA Reviewed company records for general content and documents for administration of case.	0.70 300.00/hr	210.00
	TB Emails to and from the Trustee regarding vendor payment. Completed vendor set up, entered invoices and prepared check file. Confirmed vendor check number assignment.	0.70 150.00/hr	105.00
8/9/2018	TB Reviewed emails from the Trustee. Researched payment information as necessary and responded to same. Entered banking transactions to date and reconciled to bank activity balances.	1.50 150.00/hr	225.00
8/10/2018	TB Reviewed and responded to emails from the Trustee regarding bank statements and monthly reporting. Cursory review of prior monthly report. Researched employee information and emailed to Scott Askue as requested. Phone conversation with Scott Askue regarding monthly operating report.	0.90 150.00/hr	135.00
	SSA Researched stop payment in early July 2018 and impact on premiums.	0.50 300.00/hr	150.00
	SSA Researched for information for preparation of the June and July operating reports. Discussed transactions with Theresa Brummer.	1.70 300.00/hr	510.00
8/12/2018	TB Reviewed May 2018 operating report. Began compiling monthly operating report information for June.	1.80 150.00/hr	270.00
8/14/2018	SSA Reviewed email, researched for information and responded to issues for preparation and clarify in the preparation of the June and July operating reports.	0.50 300.00/hr	150.00
8/15/2018	SSA Reviewed debtor physical records for select transactions, unreported assets and transfer and other items of interest for the administration of case, reporting, claims and other matters.	2.50 300.00/hr	750.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/16/2018	TB Reviewed the East West Bank accounts for recent activity. Compiled remaining available information for June monthly operating report.	1.00 150.00/hr	150.00
	SSA Reviewed and verified content of Motion to Pay Insurance premiums.	0.20 300.00/hr	60.00
8/17/2018	TB Reviewed the East West Bank accounts for recent activity. Reconciled bank accounts for July; updated for August activity and reconciled to date. Updated monthly operating report for July.	1.80 150.00/hr	270.00
8/18/2018	TB Reviewed the East West Bank accounts for recent activity. Entered banking transactions into Quickbooks and reconciled to date.	0.30 150.00/hr	45.00
8/20/2018	SSA Reviewed post petition premium receipts and affected policies, carriers, etc and report of same. Updated with additional receipts and stopped check. Prepared calculation of funds to forward to carriers and other parties.	2.90 300.00/hr	870.00
	SSA Reviewed available funds, premiums received and calculated funds in estate.	0.50 300.00/hr	150.00
8/23/2018	SSA Continued review of debtor's records for documents relevant to operating reports, transfer of assets, potential litigation, carrier claims and other matters.	2.50 300.00/hr	750.00
8/24/2018	SSA Updated June 2018 operating report based on available information.	1.30 300.00/hr	390.00
	SSA Updated July 2018 operating report based on available information.	1.20 300.00/hr	360.00
8/28/2018	SSA Reviewed account balances and prepared instructions for preparation of checks to transfer funds from East West Bank to Rabo Bank.	0.40 300.00/hr	120.00
	SSA Reviewed available payment information on CDs provided by the bank. Drafted email to Henry Sewell regarding same.	0.40 300.00/hr	120.00
	TB Reviewed the East West Bank accounts for recent activity; entered banking transactions and reconciled to date. Set up vendor and prepared check files to transfer funds to Rabobank account for Trustee.	0.60 150.00/hr	90.00
8/30/2018	SSA Reviewed transaction report prepared by Prosight. Reviewed electronic records relating to same and availability of additional data.	2.40 300.00/hr	720.00
8/31/2018	SSA Researched for payments returned to premium finance companies and carries after the conversion. Drafted email to Constance Woods regarding same.	0.60 300.00/hr	180.00
9/5/2018	SSA Reviewed incoming checks payable to Debtor relating to financed polices and return of premiums. Drafted email to the Trustee regarding treatment of same.	0.50 300.00/hr	150.00
	SSA Reviewed pre-petition transactions records. Researched for payments to select parties. Prepared report of same.	2.50 300.00/hr	750.00
	SSA Finalized reconciliation of transactions, AP and AR and completed the June 2018 operating report.	1.10 300.00/hr	330.00
	SSA Finalized reconciliation of transactions, AP and AR and completed the July 2018 operating report.	1.00 300.00/hr	300.00
9/6/2018	SSA Prepared details of premium receipts in late July and early August 2018. Drafted email to Michelle Madison regarding same.	1.10 300.00/hr	330.00
9/7/2018	SSA Reviewed and edited motion to operate business relating to data retention, reporting and tax issues required. Discussed same with the Trustee.	0.50 300.00/hr	150.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/8/2018	TB Reviewed the East West Bank accounts for recent activity; reconciled August 2018 to online balances. Backed up the QuickBooks company file and transferred for offsite storage.	0.80 150.00/hr	120.00
9/10/2018	SSA Reviewed and verified content of data for motion to operate business. Discussed same with the Trustee.	0.50 300.00/hr	150.00
	SSA Compiled bank statements and data for preparation of post petition ledger and analysis of transactions. Researched and drafted emails to the Trustee regarding post petition receipts and handling of same.	1.20 300.00/hr	360.00
9/11/2018	SSA Reviewed various requests for information, available data and documents and other matters for research. Drafted email to Michelle Madison regarding same.	1.30 300.00/hr	390.00
	SSA Researched nature and timing of two payments from US Premium Finance totaling \$46k received on 7/12/18. Drafted memo of findings.	0.80 300.00/hr	240.00
9/17/2018	SSA Drafted email to Michelle Madison regarding status of requested data and consulting services for the Trustee.	0.20 300.00/hr	60.00
	SSA Researched payment of Centennial Southern policy included in motion to pay premiums.	0.30 300.00/hr	90.00
9/18/2018	SSA Reviewed collection reports and prepared report of post petition collections and proposed amounts to pay to carriers.	0.70 300.00/hr	210.00
9/19/2018	SSA Drafted email to the Trustee and Henry Sewell regarding updated report of amounts owed to carriers and others.	0.30 300.00/hr	90.00
9/21/2018	SSA Researched nature of deposit received today. Drafted email to Michelle Madison regarding same.	0.30 300.00/hr	90.00
10/3/2018	SSA Reviewed reports of collections and breakdown of funds to forward to various parties. Verified data to bank records and previous reports. Drafted email to Michelle Madison regarding same.	1.10 300.00/hr	330.00
10/11/2018	SSA Reviewed report of funds collected post petition and proposed payments to carriers and others. Reviewed previous report. Drafted email to Michelle Madison regarding updates to final report for Motion to distribute funds.	0.50 300.00/hr	150.00
10/12/2018	SSA Prepared updated report of funds to be paid to carriers. Drafted email to Henry Sewell regarding same.	0.60 300.00/hr	180.00
10/16/2018	SSA Reviewed updated report with manual adjustments for later receipts received from Michelle Madison. Drafted email to same regarding prior communications with carriers.	0.30 300.00/hr	90.00
10/19/2018	SSA Researched issues raised by local agents regarding returned premiums and status of policies. Updated report of premiums to forward to carriers and other. Drafted emails to Michelle Madison regarding same. Drafted email to Henry Sewell regarding same.	2.60 300.00/hr	780.00
10/24/2018	SSA Reviewed report of policy premiums received to date prepared by Michelle Madison. Drafted email to same. Researched treatment of policies by carriers post petition and potential returned premium claims.	1.20 300.00/hr	360.00
10/30/2018	SSA Researched collection and return of funds relating to Centennial Southern policy.	0.30 300.00/hr	90.00
	SSA Reviewed and verified content of motion to turnover insurance premiums. Discussed same with Henry Sewell.	1.10 300.00/hr	330.00
	SSA Drafted letter to the US Dept of Commerce regarding notice received.	0.30 300.00/hr	90.00
10/31/2018	SSA Reviewed report of post petition premium collections. Drafted email to Michelle Madison regarding select payees and nature of payments to same.	0.40 300.00/hr	120.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2018	SSA	Drafted email to Michelle Madison regarding contact information for insured companies affected by motion to pay carriers and other issues.	0.30 300.00/hr	90.00
	SSA	Prepared updated exhibit for motion to pay carriers.	0.30 300.00/hr	90.00
	SSA	Reviewed and verified content of Motion to Turnover Insurance premiums. Drafted comments for Henry Sewell.	0.50 300.00/hr	150.00
11/2/2018	SSA	Researched issues relating to specific insurance polices and receipt and payment of premiums.	0.40 300.00/hr	120.00
	SSA	Researched issues with receipt and payment of policies associated with AIG. Drafted findings.	1.10 300.00/hr	330.00
11/5/2018	SSA	Formatted report of insured clients affected by motion to turnover funds.	0.20 300.00/hr	60.00
11/7/2018	DAB	Discussed issues with Scott Askue regarding retrieval of East West Bank account statements. Reviewed and responded to email from Mr. Askue regarding same. Verified log in details. Downloaded transactions from three bank accounts.	2.50 175.00/hr	437.50
11/15/2018	DAB	Downloaded additional East West Bank Statements from account website.	0.50 175.00/hr	87.50
11/27/2018	SSA	Reviewed AIG payments and application of same to policies. Drafted email to Michelle Madison regarding same. Reviewed issues with payment of financed policy and drafted email to Ms. Madison regarding same.	1.30 300.00/hr	390.00
11/29/2018	SSA	Reviewed for timing and deposit of finance premiums. Drafted summary of payments and timing of payments.	1.50 300.00/hr	450.00
11/30/2018	SSA	Reviewed remittance advise for payment of AIG policies.	0.20 300.00/hr	60.00
	SSA	Prepared policy application backup for proposed payments to carriers of post petition collections.	0.70 300.00/hr	210.00
12/11/2018	TB	Reviewed various emails from the Trustee regarding bank information. Downloaded East West Bank files as necessary.	0.40 150.00/hr	60.00
12/12/2018	SSA	Reviewed unpaid invoices and prepared exhibit for Rule 1019 report.	2.30 300.00/hr	690.00
12/14/2018	SSA	Reviewed and prepared payment of operating invoices.	0.40 300.00/hr	120.00
12/18/2018	DAB	Discussed issues with Scott Askue regarding review of bank records for payments made to principal from 2014-2018. Reviewed and responded to emails from Mr. Askue regarding same.	0.20 175.00/hr	35.00
1/16/2019	DAB	Reviewed bank statements and transaction history for payments to the Wileys and transactions. Downloaded several monthly bank statements and check copies.	1.50 175.00/hr	262.50
1/28/2019	SSA	Compiled outstanding case invoices.	0.30 300.00/hr	90.00
2/1/2019	DAB	Reviewed Synovus Bank transactions for the determination of specific transactions. Downloaded several bank statements and check copies for review.	1.00 175.00/hr	175.00
2/5/2019	SSA	Reviewed and responded to email from Henry Sewell regarding payment of approved amounts to carriers.	0.40 300.00/hr	120.00
	SSA	Drafted email to AIG regarding payment received and treatment of same.	0.20 300.00/hr	60.00
2/6/2019	DAB	Continued the review of 2017 and 2018 account transactions. Downloaded bank statements and check copies from accounting software.	1.00 175.00/hr	175.00
2/18/2019	SSA	Drafted email to AIG agent regarding funds received by the Trustee.	0.20 300.00/hr	60.00

American Underwriting Services LLC

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/18/2019	DAB Discussed issues with Henry Sewell and Scott Askue regarding recovery of specific Synovus Bank transactions.	0.20 175.00/hr	35.00
2/21/2019	SSA Researched for policy information for AIG transaction reconciliation. Drafted email to Greg Taube regarding same.	0.30 300.00/hr	90.00
	SSA Reviewed open administrative invoices and prepared report of same. Drafted email to Henry Sewell regarding same.	0.70 300.00/hr	210.00
2/25/2019	SSA Reviewed outstanding invoicing for services for the Chapter 7 Trustee. Prepared analysis of same and exhibits for motion to pay.	0.90 300.00/hr	270.00
3/6/2019	SSA Drafted email to Carrie Read regarding WNC invoice.	0.20 300.00/hr	60.00
3/8/2019	SSA Reviewed and verified content of report of Chapter 11 administrative claims.	0.30 300.00/hr	90.00
3/12/2019	SSA Discussed payment of post petition payments to carriers with Eric Silva. Drafted email to same regarding same.	0.30 300.00/hr	90.00
3/18/2019	SSA Drafted email to Eric Silva regarding payment of post petition premiums.	0.20 300.00/hr	60.00
4/12/2019	SSA Reviewed and reconciled cost of administration chapter 11 claims relating to post petition premium receipts. Researched debtor's electronic records for application of same.	3.50 300.00/hr	1,050.00
4/19/2019	SSA Reviewed and researched validity of Chapter 11 claims filed by Chubb and related entities. Drafted memo of findings.	0.90 300.00/hr	270.00
4/22/2019	SSA Researched and responded to Eric Silva regarding payment of post petition premiums.	0.30 300.00/hr	90.00
5/8/2019	SSA Researched for post petition receipts on American Millennium policies and payments to American Millennium. Drafted email to Eric Silva regarding same for administrative claim reconciliation.	2.30 300.00/hr	690.00
5/14/2019	SSA Reviewed debtor's records for information regarding post petition premiums collected for policies under AIG. Matched debtor records to information provided by AIG. Reconciled amounts claimed as an administrative claims.	3.70 300.00/hr	1,110.00
5/15/2019	SSA Researched policies and payments associated AIG's administrative claim.	1.20 300.00/hr	360.00
5/16/2019	SSA Reviewed for information necessary for payment to remaining post petition premium payments. Drafted email to Henry Sewell regarding same.	0.30 300.00/hr	90.00
5/20/2019	SSA Reviewed objections to administrative claims of Triumph and Risk Placement. Reconciled same to debtor's records.	0.50 300.00/hr	150.00
5/29/2019	SSA Reviewed and replied to email from Henry Sewell regarding status of check to Brit UW Limited.	0.20 300.00/hr	60.00
7/12/2019	SSA Reviewed administrative claim of AIG. Researched debtor's files for information on same. Prepared analysis of policy payments for review. Drafted email to Michelle Madison regarding same.	1.60 300.00/hr	480.00
7/22/2019	SSA Prepared report of assets and debts as of conversion to Chapter 7 for 1019 report.	0.70 300.00/hr	210.00
	TB Researched bank information and responded to email from Scott Askue for rule 1019 report.	0.30 150.00/hr	45.00
7/23/2019	SSA Prepared report of transactions in DIP EastWest Bank account for manual entry into Trustee's case management system for preparation of Trustee interim Reports.	1.30 300.00/hr	390.00

American Underwriting Services LLC

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/26/2019	SSA Reviewed, verified and updated transactions in Trustee accounting at East West bank.	0.50 300.00/hr	150.00
8/12/2019	SSA Reviewed file and available data. Drafted email to Michelle Madison regarding accessing server for research of AIG post petition claim and data used for preparation of tax returns.	0.30 300.00/hr	90.00
8/13/2019	SSA Reviewed email from Michelle Madison regarding AIG claim reconciliation. Prepared bank statements for same. Discussed briefly with Eric Silva.	0.40 300.00/hr	120.00
8/20/2019	SSA Reviewed and verified content of objection to American Millennium administrative clam.	0.40 300.00/hr	120.00
8/21/2019	SSA Reviewed debtors records, operating reports and case file. Prepared supporting documents and findings relating to administrative claim filed by AmeriComp.	1.10 300.00/hr	330.00
	SSA Reviewed documents prepared by Michelle Madison relating to AIG's administrative claim. Prepared documents and drafted findings for objection to claim.	1.30 300.00/hr	390.00
8/22/2019	SSA Reviewed document provided by Michelle Madison regarding open Chubb policies. Researched payments to Trustee. Drafted email resolving administrative claim filed by same.	1.00 300.00/hr	300.00
8/26/2019	SSA Drafted email to Henry Sewell regarding status of outstanding premium payment checks and replacement of same.	0.30 300.00/hr	90.00
	SSA Reviewed chapter 11 expenses and assets in the estate upon conversion. Prepared report of same for report per rule 1019.	1.20 300.00/hr	360.00
8/27/2019	SSA Reviewed outstanding Chapter 7 administrative expenses. Prepared report and supporting documents for same.	1.10 300.00/hr	330.00
8/28/2019	SSA Reviewed outstanding administrative invoices. Drafted memo detailing payments per prior order and invoices which require court approval.	0.40 300.00/hr	120.00
9/4/2019	SSA Drafted email to Carrie Read regarding status of outstanding WNC invoices for data hosting.	0.20 300.00/hr	60.00
10/22/2019	DAB Reviewed and responded to emails from the Trustee and Theresa Brummer regarding retrieval of July 2018 bank statements. Reviewed file for requested information and discussed with Scott Askue.	0.30 175.00/hr	52.50
1/6/2020	SSA Reviewed debtor records relating to dispute over AIG's claims. Drafted email regarding findings.	1.60 300.00/hr	480.00
1/29/2020	SSA Indexed Debtor data and researched for information relating to insurance agent payments and carrier agreements.	0.50 300.00/hr	150.00
5/7/2020	SSA Researched for transaction information for payments of Green Globe premiums owed to AIG. Drafted email to Eric Silva regarding same.	0.60 300.00/hr	180.00
5/29/2020	SSA Researched for bank statements and transactions relating to Green Globe policy.	0.40 300.00/hr	120.00
7/21/2021	DAB Estimated time to arrange and supervise secure destruction of company records and computers.	2.00 175.00/hr	350.00
	Subtotal	103.50	27,950.00

Business Analysis

7/27/2018	SSA Traveled to and from Debtor's office in Kennesaw. Met with employees regarding closing of office. Reviewed documents to be removed. Reviewed available information for administration of case after shutdown.	3.30 300.00/hr	990.00
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		<u>Hrs/Rate</u>	<u>Amount</u>
7/30/2018	DAB Discussed issues with the Trustee and Scott Askue regarding coordination of shut down of operations and removal of business records and computers. Emails to and from Mr. Askue and Theresa Brummer regarding payables. Reviewed and responded to several emails from the Trustee regarding office contents and preparation of closing.	1.00 175.00/hr	175.00
7/31/2018	DAB Traveled to and from American Underwriting Services in Kennesaw, GA. Met with Scott Askue and employees at the business location. Removed business records and computers. Coordinated shut down of operations. Transported computers to secure storage facility.	4.00 175.00/hr	700.00
	DAB Continued shut down of operations and recovery of computers and business records.	1.00 175.00/hr	175.00
8/3/2018	SSA Reviewed and responded to email from Taylor Cline regarding contact with Lloyds. Reviewed server for documents associated with Lloyds of London policies. Prepared documents for production.	2.70 300.00/hr	810.00
	SSA Telephone call from agent regarding American Millennium policies and service of same. Drafted email to Henry Sewell regarding same.	0.30 300.00/hr	90.00
8/7/2018	SSA Discussions and emails regarding resolution of agent and premium issues.	0.30 300.00/hr	90.00
8/13/2018	SSA Reviewed notices received by Debtor. Drafted letters to 15 insureds, agents and carriers regarding status of debtor and suggestion they should respond.	2.30 300.00/hr	690.00
8/14/2018	SSA Reviewed notices and other matters regarding returned premiums, financed premiums, cancellation notices and other matters regarding wind down and turnover of policies. Drafted memo issues and recommendations for resolution. Discussed same with the Trustee and Henry Sewell. Drafted notices to insured regarding cancellations.	2.50 300.00/hr	750.00
	SSA Researched and responded to emails from Trustee and Henry Sewell regarding post petition premiums received.	0.50 300.00/hr	150.00
8/17/2018	SSA Reviewed various notices from finance companies and insurance carriers. Prepared mailing to affected insured.	0.30 300.00/hr	90.00
8/20/2018	SSA Reviewed incoming mail from carriers and premium finance companies. Researched and prepared letter to forward notice to insured.	0.40 300.00/hr	120.00
8/21/2018	SSA Reviewed for specific payment on insurance policy to confirm policy is active. Drafted email to Seneca regarding same.	0.40 300.00/hr	120.00
	SSA Researched and drafted email to Lynn Jacques regarding policy issues. Researched and drafted email to Rachel Lyons regarding policy issues.	0.50 300.00/hr	150.00
8/23/2018	SSA Reviewed and responded to email from Constance Wood regarding handling of premium payments.	0.20 300.00/hr	60.00
	SSA Reviewed and forwarded notices to insured.	0.30 300.00/hr	90.00
8/27/2018	SSA Reviewed a large volume of notices from carriers and premium finance companies. Researched contact information and forwarded to insureds.	0.80 300.00/hr	240.00
8/28/2018	SSA Reviewed various notices and forwarded as necessary.	0.60 300.00/hr	180.00
8/29/2018	SSA Drafted letters and forwarded notices to insureds.	0.30 300.00/hr	90.00
9/4/2018	SSA Reviewed notices from various insurance companies and premium finance companies. Drafted notices and forwarded same to affected insured.	0.40 300.00/hr	120.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/5/2018	SSA Reviewed notices from various insurance companies and premium finance companies. Drafted notices and forwarded same to affected insured.	0.40 300.00/hr	120.00
9/18/2018	SSA Drafted letter to insured regarding notice from carrier.	0.20 300.00/hr	60.00
9/24/2018	SSA Researched and forwarded policy change notices to affected insured.	0.30 300.00/hr	90.00
9/25/2018	SSA Researched and forwarded notices received by Debtor to affected insured parties.	0.40 300.00/hr	120.00
9/28/2018	SSA Researched and prepared notices to former customers regarding potential changes to their policies.	0.60 300.00/hr	180.00
10/9/2018	SSA Reviewed various notices. Drafted notices to insured regarding same.	0.40 300.00/hr	120.00
10/10/2018	SSA Researched and drafted email to Michelle Madison regarding Tyser policy status as requested by adjuster.	0.40 300.00/hr	120.00
	SSA Researched issues relating to Puma Logistics policy. Drafted email to Nicole Thur regarding same.	0.30 300.00/hr	90.00
	SSA Researched and drafted email to Cristy Dale regarding policy cancellation request and issues with same.	0.30 300.00/hr	90.00
10/11/2018	SSA Reviewed and responded to email from Cristy Dale of Mid Penn Brokers regarding returned premiums.	0.20 300.00/hr	60.00
10/15/2018	SSA Reviewed notices and drafted letters to insureds regarding same.	0.30 300.00/hr	90.00
10/19/2018	SSA Telephone call to Whitney Fraser of the Texas Department of Insurance. Drafted summary of discussions. Reviewed email from same.	0.50 300.00/hr	150.00
10/25/2018	SSA Reviewed cancellation notices and forward as necessary.	0.30 300.00/hr	90.00
10/31/2018	SSA Drafted letter to Whitney Fraser with the TX Department of Insurance regarding surrender of licenses.	0.60 300.00/hr	180.00
11/6/2018	SSA Reviewed, researched and forwarded notices to insured.	0.20 300.00/hr	60.00
11/7/2018	SSA Drafted notice of insured regarding treatment of policy by carrier.	0.20 300.00/hr	60.00
11/15/2018	SSA Researched and drafted email to Brian Munoz regarding servicing of his client's policies.	0.30 300.00/hr	90.00
11/16/2018	SSA Researched payment and coverage issues with select clients.	1.50 300.00/hr	450.00
11/28/2018	SSA Prepared letter and forwarded notice to insured.	0.20 300.00/hr	60.00
12/5/2018	SSA Restored data and researched for select policy information.	0.60 300.00/hr	180.00
12/11/2018	SSA Forwarded notices to insureds.	0.20 300.00/hr	60.00
12/19/2018	SSA Prepared letters and forwarded notices to insureds.	0.20 300.00/hr	60.00
3/18/2019	SSA Drafted letter to insured regarding notice from carrier.	0.20 300.00/hr	60.00
	Subtotal	30.90	8,520.00

Claims Administration & Objections

9/14/2020	SSA Reviewed filed claims and prepared analysis of same for final distribution.	3.20 300.00/hr	960.00
10/9/2020	SSA Reviewed filed proofs of claim. Prepared distribution analysis based on estimated claims and objections.	3.10 300.00/hr	930.00
11/19/2020	SSA Updated distribution analysis. Prepared email regarding claim objections.	0.40 300.00/hr	120.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	Subtotal	6.70	2,010.00
<u>Data Analysis</u>			
7/30/2018	SSA Telephone call from Mark Read of WNC regarding shutdown of operations and changing of emails access.	0.30 300.00/hr	90.00
7/31/2018	SSA Traveled to and from debtor's office. Met with employees and WNC regarding server move and restore. Archived and indexed files and computer data.	3.90 300.00/hr	1,170.00
	SSA Reviewed and responded to email from Nick Crago of Lloyds regarding document request. Discussed same with Stephen Uhler.	0.30 300.00/hr	90.00
	SSA Reviewed invoices from WNC for data work post petition and calculated Chapter 11 claim.	0.40 300.00/hr	120.00
8/2/2018	SSA Telephone conference with Henry Sewell, the Trustee and representatives of Lloyds. Drafted email to Tysers regarding production of data. Reviewed debtor's files. Drafted email to Stephen Uhler regarding same. Prepared production documents.	2.60 300.00/hr	780.00
	SSA Reviewed emails regarding remote access to server.	0.20 300.00/hr	60.00
8/8/2018	SSA Reviewed and replied to Simon Palmer regarding transfer of Lloyds of London data.	0.30 300.00/hr	90.00
8/9/2018	SSA Gained access to and reviewed emails of former employees for transaction information. Reviewed data backup drive for same.	2.70 300.00/hr	810.00
	SSA Drafted email to Simon Palmer with Tysers regarding document transfer and claim issues.	0.30 300.00/hr	90.00
	SSA Formatted and prepared data of insurance agent contacts information for motion to reject agreements.	1.10 300.00/hr	330.00
8/10/2018	SSA Reviewed server for available data for production.	1.30 300.00/hr	390.00
8/13/2018	SSA Reviewed and replied to email from Jon Aberman regarding data production. Complied data for transfer.	1.60 300.00/hr	480.00
8/14/2018	SSA Researched for, compiled, formatted and attempted to transfer data to carrier through secure data service.	1.00 300.00/hr	300.00
8/16/2018	SSA Prepared data for transfer to Lloyds of London. Drafted email to Simon Palmer regarding same.	1.50 300.00/hr	450.00
8/17/2018	SSA Drafted email to Nick Crago regarding Lloyds of London endorsement and data production.	0.20 300.00/hr	60.00
8/21/2018	SSA Reviewed server backup. Prepared policy and other documents relating to American Southern. Prepared drive for production.	1.30 300.00/hr	390.00
8/23/2018	SSA Drafted email to Constance Wood with American Southern Insurance regarding production of data.	0.20 300.00/hr	60.00
	SSA Prepared data for transmission to Chubb.	1.00 300.00/hr	300.00
8/24/2018	SSA Updated data to Ken Franklin's attention through Duane Morris transfer site. Traded emails regarding same.	1.00 300.00/hr	300.00
8/30/2018	SSA Drafted email with instructions for remote connection to the AUS server.	0.30 300.00/hr	90.00
8/31/2018	SSA Telephone calls to Intermedia to arrange for continued storage of debtor's emails.	0.40 300.00/hr	120.00
9/5/2018	SSA Reviewed issues and drafted email to Michelle Madison regarding accessing data and reports for E&O carriers and others.	0.30 300.00/hr	90.00
9/7/2018	SSA Drafted emails to Mark Warrington with WNC regarding payment of outstanding invoices for data services.	0.20 300.00/hr	60.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/20/2018	SSA Telephone call to Comcast to terminate service. Telephone call to WNC regarding access to server, past due bills and other data matters. Telephone call to Michelle Madison regarding access to server and reports needed.	1.10 300.00/hr	330.00
	SSA Reviewed invoices from WNC (data service provider) and reviewed status of authority to pay. Drafted email to Carrie Read of WNC regarding same.	0.30 300.00/hr	90.00
10/2/2018	SSA Reviewed and responded to email from Michelle Madison regarding remote connection to AUS server.	0.20 300.00/hr	60.00
10/15/2018	SSA Drafted email to Mark Warrington regarding downloading and preparing hosted emails for local review.	0.30 300.00/hr	90.00
11/13/2018	SSA Reviewed status of Debtor's email data. Drafted recommendation for treatment of same.	0.30 300.00/hr	90.00
11/16/2018	SSA Drafted email to Trustee regarding email production. Met with Chris Smith regarding same.	0.30 300.00/hr	90.00
12/6/2018	SSA Reviewed and drafted email to Henry Sewell regarding documents for production to Pro Sight.	0.40 300.00/hr	120.00
2/4/2019	SSA Resolution of Intermedia data and account issues.	0.40 300.00/hr	120.00
2/5/2019	SSA Drafted emails to and reviewed emails from Carrie Read regarding data hosting.	0.20 300.00/hr	60.00
2/14/2019	SSA Reviewed status and drafted email to Chris Smith regarding hosted email	0.30 300.00/hr	90.00
4/15/2019	SSA Reviewed charges and drafted email to Chris Smith regarding status of Intermedia data hosting.	0.30 300.00/hr	90.00
5/3/2019	SSA Reviewed status of data stored at Intermedia. Drafted email to Chris Smith of WNC regarding same.	0.30 300.00/hr	90.00
9/16/2020	SSA Drafted emails to and reviewed emails from data hosting vendor regarding return of computers.	0.30 300.00/hr	90.00
11/16/2020	SSA Reviewed and replied to email from data management firm regarding website domain renewal.	0.20 300.00/hr	60.00
	Subtotal	27.30	8,190.00

Employee Benefits / Pensions

8/8/2018	SSA Prepared GA Department of Labor Separation Notices for employees let go by the Trustee. Drafted letters to same. Researched contact information.	1.50 300.00/hr	450.00
8/9/2018	SSA Prepared separation notices for former employees. Researched contact information and date of hire for same. Drafted email to specific employees regarding contact information.	1.50 300.00/hr	450.00
8/16/2018	SSA Reviewed benefit invoices and drafted email to the Trustee regarding amounts due and participation.	0.20 300.00/hr	60.00
8/29/2018	SSA Telephone call from Esther Saldivar with the TX Workers Commission regarding wages paid in Texas and final report. Researched payments and drafted email to same.	0.50 300.00/hr	150.00
9/10/2018	SSA Drafted email to Leigh Drawdy of Knights-RAWL regarding cash value in Mass Mutual policies.	0.20 300.00/hr	60.00
1/7/2019	DAB Verified employee information for annual W-2s.	1.00 175.00/hr	175.00
1/29/2019	SSA Reviewed and verified content of 2018 W-2s and 941s. Drafted email to Michelle Madison regarding same.	1.30 300.00/hr	390.00
2/26/2020	SSA Reviewed files and drafted email to Corporate Payroll Services regarding amended W2s.	0.30 300.00/hr	90.00
2/27/2020	SSA Exchanged emails with Corporate Payroll Services regarding W2s issues in year 2018 and issue raised by former employee.	0.30 300.00/hr	90.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/2/2020	SSA	Drafted email to Corporate Payroll regarding 2019 W2 relating to inquiry from former employee.	0.20 300.00/hr	60.00
11/10/2020	SSA	Researched 2018 W-2 issues and claims of former employees.	0.50 300.00/hr	150.00
11/18/2020	SSA	Emails with former employee and Corporate Payroll Services regarding discrepancy with W2s for year 2018. Resolved matter.	0.50 300.00/hr	150.00
		Subtotal	8.00	2,275.00

Fee / Employment Applications & Objection

4/14/2021	SSA	Drafted final Chapter 11 fee application and prepared exhibits to same.	2.20 300.00/hr	660.00
7/20/2021	SSA	Drafted final Chapter 7 fee application and prepared exhibits to same.	2.80 300.00/hr	840.00
Subtotal			5.00	1,500.00

Litigation Consulting

8/16/2018	SSA	Reviewed and responded to email from the Trustee regarding payment of E&O premiums and impact of claims on same.	0.30 300.00/hr	90.00
9/18/2018	SSA	Reviewed report of payments to insiders. Reviewed debtor's records relating to same.	1.80 300.00/hr	540.00
9/19/2018	SSA	Reviewed bank statements and transactions for transactions to insiders and other. Prepared exhibits and report of same.	4.20 300.00/hr	1,260.00
10/22/2018	SSA	Reviewed paper documents removed from Debtor's facility and identified documents for further review and need.	2.40 300.00/hr	720.00
10/25/2018	SSA	Finalized review of company records to support potential litigation.	2.20 300.00/hr	660.00
11/7/2018	SSA	Telephone conference with the Trustee and the Cobb County District Attorney regarding data and record production.	0.40 300.00/hr	120.00
11/8/2018	SSA	Reviewed subpoena and drafted email to the Trustee regarding compiling documents.	0.30 300.00/hr	90.00
11/13/2018	SSA	Reviewed subpoena and documents responsive to same.	0.80 300.00/hr	240.00
11/14/2018	SSA	Drafted email to Chris Smith with WNC regarding turn over of emailed data. Drafted email to Michelle Madison regarding documents responsive to subpoena. Addressed issues with same.	0.70 300.00/hr	210.00
11/15/2018	SSA	Reviewed and responded to emails from Michelle Madison regarding document productions and responsive documents for same. Reviewed documents available and additional research for additional information.	1.40 300.00/hr	420.00
11/28/2018	SSA	Met with Henry Sewell and the Trustee regarding potential claims.	0.40 300.00/hr	120.00
11/29/2018	SSA	Attempted to download documents responsive to subpoena. Drafted email to Michelle Madison regarding same.	0.30 300.00/hr	90.00
12/3/2018	SSA	Reviewed documents compiled in response to subpoena.	0.60 300.00/hr	180.00
12/4/2018	SSA	Restored and reviewed documents prepared in response to subpoena from Cobb County District Attorney.	1.00 300.00/hr	300.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/5/2018	SSA	Drafted email to Michelle Madison regarding document production and payment of invoice for same.	0.20 300.00/hr 60.00
12/6/2018	SSA	Drafted email to Trustee regarding documents produced per Cobb County District Attorney subpoena.	0.30 300.00/hr 90.00
	SSA	Drafted email to Michelle Madison regarding E&O policy for defense attorney.	0.20 300.00/hr 60.00
12/12/2018	SSA	Reviewed and identified transaction of interest for years 2014 through 2016 for claims against parties.	2.50 300.00/hr 750.00
12/13/2018	SSA	Indexed available bank records for transaction review. Met with Dwaine Butler regarding same.	1.10 300.00/hr 330.00
12/18/2018	SSA	Discussed available information for claims against insiders with Henry Sewell. Reviewed documents relating to same.	0.40 300.00/hr 120.00
	SSA	Reviewed employee emails for potential transfer of assets and recoveries.	1.90 300.00/hr 570.00
12/19/2018	DAB	Reviewed statements and CDs for information regarding transactions from 2014-2018.	0.80 175.00/hr 140.00
12/20/2018	SSA	Prepared report of bank accounts and insider names for further research.	0.40 300.00/hr 120.00
1/3/2019	DAB	Reviewed 2017 Synovus Bank statements and check copies. Downloaded statements and check images per request of counsel.	1.20 175.00/hr 210.00
1/10/2019	DAB	Reviewed several bank account documents and downloaded Wiley transactions.	0.90 175.00/hr 157.50
1/15/2019	DAB	Reviewed Synovus monthly bank transactions for information on various transfers.	0.80 175.00/hr 140.00
1/17/2019	DAB	Reviewed monthly bank statements for information regarding transfers to specific entities. Continued to download statements and check copies.	1.30 175.00/hr 227.50
1/22/2019	DAB	Reviewed monthly bank statements and transaction ledger. Downloaded statements and corresponding check copies.	2.30 175.00/hr 402.50
1/28/2019	DAB	Reviewed 2017 and 2018 bank statements for specific transactions. Downloaded several check copies and bank statements.	1.70 175.00/hr 297.50
2/18/2019	SSA	Reviewed and responded to email from the Trustee regarding defense of E&O claim.	0.20 300.00/hr 60.00
2/26/2019	SSA	Identified transactions with Debtor insiders and prepared analysis of same.	3.80 300.00/hr 1,140.00
2/27/2019	SSA	Continued review of bank records and production of analysis of payments to insiders and insider entities during years 2016 and 2017. Prepared and indexed supporting documents for same.	4.80 300.00/hr 1,440.00
2/28/2019	SSA	Finalized review of transactions with insiders and insider entities. Prepared report of same and exhibits for same.	4.10 300.00/hr 1,230.00
3/15/2019	SSA	Reviewed year 2015 transactions to insiders and insider companies. Updated reports to reflect additional payments. Prepared exhibits and supporting documents for same.	6.00 300.00/hr 1,800.00
3/20/2019	SSA	Restored bank statements from year 2014. Reviewed payable files. Updated report of payments to insiders. Prepared exhibits to same.	4.20 300.00/hr 1,260.00
4/2/2019	SSA	Finalized report of payments to Neil Wiley and exhibits to same.	3.20 300.00/hr 960.00
4/8/2019	SSA	Drafted email to Eric Silva regarding report of payments to Neil Wiley and supporting documents relating to same.	0.30 300.00/hr 90.00
4/29/2019	SSA	Updated report, verified data and compiled payment information relating to payments to TW3 Transportation and TW3 Logistics for complaint against insiders.	4.30 300.00/hr 1,290.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/30/2019	SSA Reviewed bank records and updated reports of payments to TW3 Logistics and TW3 Transportation. Discussed same with Henry Sewell. Prepared exhibits supporting payments.	2.60 300.00/hr	780.00
5/1/2019	SSA Reviewed and verified content of complaint against Neil Wiley et al.	1.20 300.00/hr	360.00
5/17/2019	SSA Discussed claims against Neil Wiley with Henry Sewell. Researched assets of Mr. Wiley and sale of his real property.	1.50 300.00/hr	450.00
5/30/2019	SSA Researched AUS email files of Neil Wiley and Russ Wiley to identify potential assets or transfer of assets.	3.20 300.00/hr	960.00
5/31/2019	SSA Reviewed Russ Wiley emails for information relating to recoveries and adversary.	1.40 300.00/hr	420.00
	SSA Reviewed Neil Wiley's emails for information relating to recoveries and adversary.	1.50 300.00/hr	450.00
	Subtotal	75.10	21,405.00

Tax Issues

10/29/2018	JRJ Reviewed case activity for 2018 and scheduled comments.	0.10 300.00/hr	30.00
10/31/2018	SSA Researched nature of tax payments payable in Texas. Drafted email to Henry Sewell regarding same.	0.30 300.00/hr	90.00
11/5/2018	SSA Drafted email to Michelle Madison regarding nature of Will Comply payment.	0.20 300.00/hr	60.00
1/14/2019	SSA Reviewed 2018 transactions and compiled and verified data for production of Forms 1099.	0.40 300.00/hr	120.00
1/16/2019	JRJ Reviewed and discussed payroll matters with Scott Askue. Discussed coordinating with the payroll service, and inter-company transactions between The Wiley Group, Inc. and American Underwriting Services, LLC.	0.50 300.00/hr	150.00
1/28/2019	SSA Discussed law firm payees with Henry Sewell. Drafted email to Ben Klehr regarding W9 for Small Herrin. Prepared 1099 data for remaining payees.	0.80 300.00/hr	240.00
1/31/2019	TB Formatted data and prepared forms 1099 for year 2018.	0.50 150.00/hr	75.00
4/10/2019	JRJ Responded to a notice from the Georgia Dept of Revenue regarding payroll tax assessments at or around the petition date.	0.80 300.00/hr	240.00
	SSA Discussed history and payroll taxes with Jim Jennings to respond to tax notice. Provided language for same. Drafted letter to the NY State Department of Financial Services in response to tax statement.	0.70 300.00/hr	210.00
5/6/2019	SSA Restored and reviewed emails and researched for tax returns and tax return status.	1.30 300.00/hr	390.00
5/7/2019	JRJ Drafted letter to J Carpentier of Windham Brannon (Debtor accountant) regarding request for prior year state income tax returns, internal use financial statements, or external financial statements for American Underwriting Services, LLC.	1.00 300.00/hr	300.00
6/25/2019	JRJ Prepared Georgia DOL 4 Unemployment tax return for the quarter ended March 31, 2019.	0.90 300.00/hr	270.00
7/17/2019	SSA Downloaded 2016 tax returns. Initial review of same.	0.30 300.00/hr	90.00
7/23/2019	JRJ Reviewed 2016 Corporate tax returns of American Underwriting Services, LLC / The Wiley Group, Inc.	1.00 300.00/hr	300.00
9/17/2019	JRJ Prepared Texas Final No Tax Due Report for 2019.	0.90 300.00/hr	270.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/30/2019	JRJ Reviewed year to date activity in order to assess 2019 tax filing requirements.	0.10 300.00/hr	30.00
11/1/2019	SSA Reviewed file and drafted email to Jim Jennings regarding open matters and issues to be addressed on tax returns.	0.20 300.00/hr	60.00
11/4/2019	SSA Drafted letter to the Cobb County Tax Commissioner regarding status of assets and company.	0.30 300.00/hr	90.00
11/21/2019	SSA Compiled post petition financial information for preparation of 2018 tax return.	0.60 300.00/hr	180.00
	JRJ Reviewed Bankruptcy Schedules, Monthly Operating Reports, and Ch 7 Form 2 package for the period 5/18/2018-12/31/2018 for preparation of 2018 tax return.	1.20 300.00/hr	360.00
	JRJ Created journal/ledger to capture all Monthly Operating Reports and Chapter 7 activity. Coded all transactions and reconciled to bank balances for entire post petition period.	2.90 300.00/hr	870.00
11/22/2019	JRJ Prepared journal entries for cash activity. Prepared journal entry for opening balances for accounts receivable, fixed assets, post petition payables, and pre petition payables. Prepared adjusting journal entries to reconcile receivables and payables to year end balances.	1.90 300.00/hr	570.00
	JRJ Prepared adjusting trial balance for the year ended 12/31/18. Continued analysis of accounts receivable. Prepared taxable income (loss) summary for use in preparing year ended 12/31/18 Federal and State corporate income tax return.	3.40 300.00/hr	1,020.00
11/23/2019	JRJ Prepared 2018 Federal corporate income tax return after review of 2016 return.	3.30 300.00/hr	990.00
	JRJ Prepared 2018 Georgia corporate income tax return after review of 2016 return.	1.40 300.00/hr	420.00
	JRJ Prepared accountants Disclosure Footnote to accompany 2018 Federal income tax return.	0.90 300.00/hr	270.00
	JRJ Finalized draft of 2018 corporate returns for discussion with Scott Askue. Set up 2018 Federal and State corporate income tax returns for electronic filing and cleared all Federal and State validation errors and e file error diagnostics.	1.60 300.00/hr	480.00
12/17/2019	SSA Reviewed initial draft of 2018 tax return. Discussed various issues relating to same with Jim Jennings.	1.20 300.00/hr	360.00
1/18/2021	JRJ Researched ledger for 2020 activity for determining 2020 filing requirements.	0.10 300.00/hr	30.00
	SSA Reviewed file for necessary income tax filings for year 2020 and drafted note on same.	0.20 300.00/hr	60.00
	Subtotal	29.00	8,625.00
	For professional services rendered	285.50	\$80,475.00

Exhibit C

2964 Peachtree Road
Suite 555
Atlanta, GA 30305-2153

American Underwriting Services LLC
Case # 18-58406-SMS

For the Period from 7/27/2018 to 7/21/2021

July 21, 2021

<u>Expenses</u>	<u>Amount</u>
7/31/2018 Postage	1.41
8/2/2018 Expense Report - USB drive for documents to Lloyds	8.70
8/13/2018 Web Designed fees paid to Yellahoose, LLC to add page to web site and add documents to web site in July.	50.00
8/16/2018 FedEx	62.60
8/17/2018 Pacer on-line charges	6.50
8/22/2018 FedEx	15.93
8/31/2018 Document storage	30.00
Postage	23.03
9/13/2018 FedEx	21.03
9/30/2018 Document storage	30.00
Postage	22.30
10/16/2018 FedEx	33.52
10/31/2018 Postage	11.28
Document storage	30.00
11/30/2018 Document storage	30.00
Postage	8.93
12/31/2018 Document storage	30.00
Postage	13.63
1/31/2019 1099 preparation	1.26
Document storage	30.00
Postage	9.14
FedEx	9.09
2/4/2019 January 2019 - 8 copies at \$0.50 per copy.	4.00
2/28/2019 Postage	8.77
Document storage	30.00
3/31/2019 Postage	2.65
Document storage	30.00
4/30/2019 Postage	3.30
Document storage	30.00
5/31/2019 Document storage	30.00
Postage	1.65
6/30/2019 Postage	2.50
Document storage	30.00
7/31/2019 Document storage	30.00
8/31/2019 Postage	4.40
Document storage	30.00
9/30/2019 Document storage	30.00
Postage	5.90
10/31/2019 Postage	1.00
Document storage	30.00
11/30/2019 Postage	1.00
Document storage	30.00
12/31/2019 Postage	1.00
Document storage	30.00

American Underwriting Services LLC

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	<u>Amount</u>
1/31/2020 Document storage	30.00
Postage	0.50
2/29/2020 Document storage	30.00
Postage	1.00
3/31/2020 Document storage	30.00
Postage	0.50
4/30/2020 Document storage	30.00
5/31/2020 Postage	0.50
Document storage	30.00
7/31/2020 Document storage	30.00
Postage	0.50
8/31/2020 Document storage	30.00
Postage	2.45
9/30/2020 Postage	0.50
Document storage	30.00
10/31/2020 Document storage	30.00
11/30/2020 Postage	0.50
Document storage	30.00
12/31/2020 Document storage	30.00
Document storage	30.00
2/28/2021 Document storage	30.00
Postage	0.51
3/31/2021 Postage	4.77
Document storage	30.00
4/30/2021 Postage	2.04
Document storage	30.00
5/31/2021 Document storage	30.00
6/30/2021 Document storage	30.00
7/21/2021 Projected cost to securely destroy debtor documents and computer hard drives.	500.00
Subtotal	1,868.29
Total costs	\$1,868.29

Exhibit D

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: : CHAPTER 7
:
AMERICAN UNDERWRITING : CASE NO. 18-58406-SMS
SERVICES, LLC, :
:
Debtor. :

DECLARATION

I, S. Gregory Hays, declare under penalty of perjury that:

1. I am the Managing Principal at Hays Financial Consulting, LLC (“HFC”) and have knowledge of the facts set forth herein.
2. The facts set out in the foregoing First and Final Application for Allowance of Compensation of Hays Financial Consulting, LLC as Accountants to the Chapter 7 Trustee and in the exhibits attached thereto are true and correct to the best of my knowledge, information and belief. Those facts are known to me personally and by business records of HFC, maintained in the ordinary course of business, including time and reimbursement records made by personnel at HFC.

/s/ S. Gregory Hays
S. Gregory Hays